IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

VULCAN GOLF, LLC, JOHN B. SANFILIPPO & SON, INC., BLITZ REALTYGROUP, INC., and VINCENT E. "BO" JACKSON, Individually and on Behalf of All Others Similarly Situated,	§	Civil Action No. 07 CV 3371
Lead Plaintiffs,	§	Hon. Blanche M. Manning
v.	§	
GOOGLE INC., OVERSEE.NET, SEDO LLC, DOTSTER, INC., AKA REVENUEDIRECT.COM, INTERNET REIT, INC. d/b/a IREIT, INC., and JOHN DOES I-X,	§	
Defendants.	§	

MOTION FOR CLASS CERTIFICATION

NOW COMES Lead Plaintiffs, individually and on behalf of all others similarly situated, and bring this Motion for Class Certification against Defendants Google, Inc., Oversee.net, Sedo, LLC, Dotster, LLC a/k/a Revenuedirect.com, Internet Reit, Inc. d/b/a Ireit, Inc., and John Does I-X (hereinafter collectively referred to as "Defendants"), pursuant to Rule 23 of the Federal Rules of Civil Procedure, and for their motion state as follows:

1. Lead Plaintiffs filed this action in the Northern District of Illinois, seeking to recover damages they suffered as a direct and proximate result of Defendants' Deceptive Domain Scheme.

2. Lead Plaintiffs seek to have a class certified Pursuant to Rule 23 of the Federal Rules of Civil Procedure with respect to four counts of the Third Amended Complaint: Count IV

(cybersquatting in violation of the ACPA, 15 U.S.C. § 1125(d)), Counts IX and X (contributory and vicarious trademark infringement) and Count XII (unjust enrichment).

3. The proposed class consists of:

> Any individual or owner of a mark whose personal name or mark is identical or confusingly similar to a parked domain name that has been registered, trafficked in or used for commercial gain, by one or more of the Defendants, during the period of time January 1, 2002 through the present.

(the "Class"). The proposed class may be divided into subclasses as follows:

> Subclass 1: Owners of marks that were registered with the United States Patent and Trademark Office prior to Defendant(s) monetization of the identical or confusingly similar parked domain name.
>
> Subclass 2: Owners of marks that were not registered with the United States Patent and Trademark Office prior to Defendant(s) monetization of the identical or confusingly similar parked domain name.
>
> Subclass 3: Individuals whose personal name is identical or confusingly similar to a parked domain name.

4. In support of their motion, Lead Plaintiffs have concurrently filed and hereby incorporate by reference their Memorandum of Law in Support of Plaintiffs' Motion for Class Certification.

WHEREFORE, Lead Plaintiffs hereby move the Court for an Order granting Plaintiffs' Motion for Class Certification and:

1. Certifying this case as requested pursuant to Rule 23 of the Federal Rules of Civil Procedure

2. Defining the class as proposed herein;

3. Designating Lead Plaintiffs as representatives of the class;

4. Designating Lead Plaintiffs' counsel as counsel for the class.

Dated: August 21, 2008 FOOTE, MEYERS, MIELKE & FLOWERS, LLC

By: /s/ Robert M. Foote

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CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2008, I electronically filed the foregoing document with the clerk of court for the U. S. District Court, Northern District of Illinois, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

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